

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PEGASUS WIRELESS INNOVATION LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS *et al.*,

Defendants,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

Case No. 2:23-cv-00640-JRG
(Lead Case)

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS,

Counterclaim-Plaintiff,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

v.

PEGASUS WIRELESS INNOVATION LLC,

Counterclaim-Defendant,

KT CORPORATION,

Third-Party Defendant,

Case No. 2:23-cv-00640-JRG
(Lead Case)

PEGASUS WIRELESS INNOVATION LLC,

Plaintiff,

v.

AT&T CORP. *et al.*,

Defendants,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

Case No. 2:23-cv-00638-JRG
(Member Case)

NEW CINGULAR WIRELESS PCS, LLC,

Counterclaim-Plaintiff,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

v.

PEGASUS WIRELESS INNOVATION LLC,

Counterclaim-Defendant,

KT CORPORATION,

Third-Party Defendant,

Case No. 2:23-cv-00638-JRG
(Member Case)

PEGASUS WIRELESS INNOVATION LLC,

Plaintiff,

v.

T-MOBILE USA, INC. *et al.*,

Defendants,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

Case No. 2:23-cv-00639-JRG
(Member Case)

T-MOBILE USA, INC.,

Counterclaim-Plaintiff,

ERICSSON INC. and NOKIA OF
AMERICA CORP.,

Intervenors,

v.

PEGASUS WIRELESS INNOVATION LLC,

Counterclaim-Defendant,

KT CORPORATION,

Third-Party Defendant,

Case No. 2:23-cv-00639-JRG
(Member Case)

PLAINTIFF'S UNOPPOSED MOTION TO AMEND THE
DOCKET CONTROL ORDER

Plaintiff Pegasus Wireless Innovation LLC hereby moves the Court to amend the Docket Control Order as reflected in the text of the Proposed Fifth Amended Docket Control Order. Specifically, Plaintiff seeks to amend the fact discovery deadline by two additional days and the motion to compel deadline by four additional days so that the parties can complete discovery in this case. The proposal also seeks to extend the deadline for opening and rebuttal expert reports by two additional days each to give the parties additional time to prepare expert reports. The parties have met and conferred, and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., TracFone Wireless, Inc., AT&T Corp., AT&T Services, Inc., AT&T Mobility LLC, AT&T Mobility II LLC, New Cingular Wireless PCS, LLC, Cricket Wireless LLC, T-Mobile USA, Inc., Sprint Solutions LLC, and Sprint Spectrum LLC; and Intervenor Ericsson Inc. and Nokia of America Corp. (collectively, “Defendants and Intervenor”), and Counterclaim Defendant KT Corp. do not oppose this motion. Accordingly, Plaintiff requests the Court enter a Fifth Amended Docket Control order as set forth below:

DCO Deadlines	Proposed Changes	Event
May 12, 2025	May 14, 2025	Serve Disclosures for Rebuttal Expert Witnesses
April 21, 2025	April 23, 2025	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
April 14, 2025	April 18, 2025	Deadline to File Motions to Compel Discovery
April 14, 2025	April 16, 2025	Deadline to Complete Fact Discovery

The parties respectfully request that the Court enter their proposed Fifth Amended Docket Control Order.

DATED: April 9, 2025

Respectfully submitted,

By: /s/ Jeff Melsheimer

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ATTORNEYS FOR PLAINTIFF

PEGASUS WIRELESS INNOVATION

LLC, AND THIRD-PARTY DEFENDANT

KT CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Jeff Melsheimer

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff and KT met and conferred via email with counsel for Defendants and Intervenors, who indicated that they do not oppose the relief request herein.

/s/ Jeff Melsheimer